

1. Fact Discovery Cut-Off. All fact discovery will be completed on or before October 7, 2022. Unless otherwise ordered by the Bankruptcy Court or agreed to by the Parties, the limitations on discovery set forth in the Federal Rules of Civil Procedure, made applicable to this Adversary Proceeding by the Federal Rules of Bankruptcy Procedure, shall be strictly observed. Any request to add additional depositions beyond the 10-per-side permitted by Federal Rule of Civil Procedure 30 shall be subject to a meet and confer between the Parties and, if necessary, a motion with the Bankruptcy Court.

2. Disclosure of Expert Testimony. The Parties shall serve their initial Federal Rule of Civil Procedure 26(a)(2) disclosures of expert testimony on or before October 14, 2022, for any issue on which they bear the burden of proof. If applicable, the Parties shall file a supplemental disclosure to contradict or rebut evidence on the same subject matter identified by another Party on or before November 11, 2022.

3. Expert Discovery Cut-Off: All expert discovery, including depositions, will be completed on or before January 3, 2023

4. Dispositive Motion Deadline: Pursuant to Rule 7007-1 of the Local Rules for the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), the following deadlines shall apply to the filing and briefing of dispositive motions: All dispositive motions shall be filed and served by no later than fourteen (14) days after the close of expert discovery (or, January 17, 2023) pursuant to Rule 7056 of the Federal Rules of Bankruptcy Procedure. Opposition papers shall be filed and served thirty (30) days later. Reply papers shall be filed and served fourteen (14) days later.

5. Motion to Withdraw the Reference. Defendants may renew their motion to withdraw the reference of this Adversary Proceeding pursuant to 28 U.S.C. § 157(d) on or before February

13, 2023. Plaintiff reserves all rights to object to any such renewal that Defendants may file, including, but not limited to objections based on contractual language and, generally, objections to any asserted grounds for withdrawal of the reference.

6. For the avoidance of doubt, all other provisions and deadlines set forth in the Scheduling Order (D.I. 66) shall remain in full force and effect, with the exception of the foregoing deadlines addressed herein.

Dated: August 22, 2022

Respectfully submitted,

DLA PIPER LLP (US)

/s/ Matthew P. Denn

Matthew P. Denn (Bar No. 2985)
Matthew S. Sarna (Bar No. 6578)
1201 North Market Street, Suite 2100
Wilmington, DE 19801-1147
302.468.5700
302.394.2341 (Fax)
Email: matthew.denn@us.dlapiper.com
matthew.sarna@us.dlapiper.com

Brett Ingerman (admitted *pro hac vice*)
DLA PIPER LLP (US)
The Marbury building
6225 Smith Avenue
Baltimore, MD 21209-3600
410.580.3000
410.580.3001 (Fax)
Email: brett.ingerman@us.dlapiper.com

*Attorneys for Continental Casualty
Company*

REED SMITH LLP

/s/ Mark W. Eckard

Mark W. Eckard (No. 4542)
1201 North Market Street, Suite 1500
Wilmington, DE 19801
(302) 778-7500
(302) 778-7575 (Fax)
meckard@reedsmith.com

David E. Weiss (admitted *pro hac vice*)
T. Connor O'Carroll (admitted *pro hac vice*)
101 Second Street, Suite 1800
San Francisco, CA 94105-3659
(415) 543-8700
(415) 391-8269 (Fax)
dweiss@reedsmith.com
cocarroll@reedsmith.com

*Counsel for Plaintiff 24 HOUR FITNESS
WORLDWIDE, INC.*

HOGAN McDANIEL

/s/ Garvan F. McDaniel

Garvan F. McDaniel (No. 4167)
1311 Delaware Avenue
Wilmington, DE 19806
(302) 656-7596
(302) 656-7599 (Fax)
gfmcdaniel@dkhogan.com

Benjamin W. Loveland (admitted *pro hac
vice*)

**WILMER CUTLER PICKERING
HALE AND DORR LLP**

60 State Street
Boston, MA 02109
(617) 526-6641
benjamin.loveland@wilmerhale.com

Lauren R. Lifland (admitted *pro hac vice*)
**WILMER CUTLER PICKERING
HALE AND DORR LLP**
7 World Trade Center
250 Greenwich Street
New York, NY 10007
(212) 230-8800
lauren.lifland@wilmerhale.com

Counsel to Starr Surplus Lines Insurance Company; Allianz Global Risks US Insurance Company; Certain Underwriters at Lloyd's of London subscribing to Policy No. W27C0A190101; incorrectly sued as "Beazley-Lloyd's Syndicates 2623/623"; QBE Specialty Insurance Company and General Security Indemnity Company of Arizona

**GELLERT SCALI BUSENKELL &
BROWN, LLC**

/s/ Michael Busenkell
Michael Busenkell (DE No. 3933)
1201 N. Orange Street, Suite 300
Wilmington, DE 19801
(302) 425-5812
mbusenkel@gsbblaw.com

Richard G. Haddad (admitted *pro hac vice*)
OTTERBOURG, P.C.
230 Park Avenue
New York, NY 10169-0075
(212) 661-9100
rhaddad@otterbourg.com

Counsel to Allied World National Assurance Company

Stacey S. Farrell (admitted *pro hac vice*)
Marlie McDonnell (admitted *pro hac vice*)

CLYDE & CO US LLP
271 17th Street NW, Suite 1720
Atlanta, GA 30363
(404) 410-3150
stacey.farrell@clydeco.us
marlie.mcdonnell@clydeco.us

*Counsel to Allianz Global Risks US
Insurance Company*

Courtney E. Murphy (admitted *pro hac vice*)
Kyle M. Medley (admitted *pro hac vice*)
Adam S. Cohen (admitted *pro hac vice*)

HINSHAW & CULBERTSON LLP
800 Third Avenue, 13th Floor
New York, NY 10022
(212) 471-6200
cmurphy@hinshawlaw.com

*Counsel to Starr Surplus Lines Insurance
Company and Certain Underwriters at
Lloyd's of London subscribing to Policy No.
W27C0A190101, incorrectly sued as
"Beazley-Lloyd's Syndicates 2623/623"*

Matthew M. Burke (admitted *pro hac vice*)
ROBINS KAPLAN LLP
800 Boylston Street, Suite 2500
Boston, MA 02199
(617) 859-2711
mburke@robinkaplan.com

Douglas R. Gooding (admitted *pro hac vice*)

Jonathan D. Marshall (admitted *pro hac vice*)

CHOATE, HALL & STEWART LLP

Two International Place

Boston, MA 02110

(617) 248-5000

dgooding@choate.com

jmarshall@choate.com

*Counsel to Liberty Mutual Fire Insurance
Company*

Elizabeth Kniffen (admitted *pro hac vice*)

ZELLE LLP

500 Washington Avenue South, Suite 4000

Minneapolis, MN 55415

(612) 359-4261

ekniffen@zelle.com

*Counsel to QBE Specialty Insurance
Company and General Security Indemnity
Company of Arizona*